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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 23-00017-JD
	)	
Plaintiff,	)	STIPULATION TO CONTINUE STATUS
	)	CONFERENCE AND EXCLUDE TIME FROM
v.	)	OCTOBER 21, 2024 TO NOVEMBER 25, 2024
	)	AND <del>[PROPOSED]</del> ORDER
LUCAS MICHAEL NOVICK	)	
	)	
Defendant.	)	

The Court has continued the change of plea hearing in this matter from October 21, 2024 to November 25, 2024. Dkt. 52. It is further stipulated by and between counsel for the United States and counsel for the defendant Lucas Michael Novick, that time be excluded under the Speedy Trial Act from October 21, 2024 through November 25, 2024.

The government has produced discovery to the defendant, and defense counsel is continuing to review these documents. In addition, defense counsel has provided mitigation information to the government, including results from a recent psychological evaluation of the defendant. The parties are continuing to engage in plea negotiations and anticipate moving forward with a change of plea hearing on November 25, 2024, or setting this matter for a trial date.

STIPULATION TO EXCLUDE TIME AND  
~~[PROPOSED]~~ ORDER  
CR 23-00017-JD

For these reasons, the parties stipulate and agree that excluding time between October 21, 2024 and November 25, 2024 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from October 21, 2024 through November 25, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: October 24, 2024

Respectfully submitted,

ISMAIL J. RAMSEY  
United States Attorney

/s/ Roland Chang  
ROLAND CHANG  
Assistant United States Attorney

DATED: October 24, 2024

JODI LINKER  
Federal Public Defender

/s/ Sophia Whiting  
SOPHIA WHITING  
Counsel for Lucas Michael Novick

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from October 21, 2024 through November 25, 2024 would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from October 21, 2024 through November 25, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from October 21, 2024 through November 25, 2024 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: November 7, 2024



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HON. JAMES DONATO  
United States District Judge